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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 INFOSPAN, INC.,
16 Plaintiff,
17 v.
18 EMIRATES NBD BANK PJSC,
19 Defendant.
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Case No. 8:11-CV-01062 JVS (ANx)

Hon. James V. Selna

**DECLARATION OF NIMA H.
MOHEBBI IN SUPPORT OF
EMIRATES NBD BANK PJSC'S
MOTION TO ADMIT TRIAL
EXHIBIT 2255 AND RELATED
TESTIMONY**

1 I, Nima H. Mohebbi, declare and state as follows:

2 1. I am an attorney licensed to practice law in the State of California, and
 3 associate at Latham & Watkins LLP, counsel of record for Defendant Emirates
 4 NBD Bank PJSC. I have personal knowledge of the matters recited herein, and if
 5 called upon to testify, I could and would competently testify thereto. I make this
 6 Declaration in support of Emirates NBD Bank PJSC's Motion to Admit Trial
 7 Exhibit 2255 and Related Testimony.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of InfoSpan,
 9 Inc.'s responses to Defendant Emirates NBD Bank PJSC's Third Set of Requests
 10 for Production of Documents to Plaintiff InfoSpan, Inc. (Nos. 46-91), dated August
 11 29, 2014.

12 3. Attached hereto as **Exhibit B** is a true and correct copy of an August
 13 12, 2015 letter from Steven Bauer to William Isaacson.

14 4. Attached hereto as **Exhibit C** is a true and correct copy of an August
 15 13, 2015 letter from David L. Zifkin to Steven Bauer.

16 5. I assisted in the preparation of Emirates Bank's initial exhibit list.
 17 That exhibit list contained the documents InfoSpan now challenges. The Bank's
 18 initial exhibit list was served on InfoSpan via email on September 18, 2015.
 19 Attached as **Exhibit D** is a true and correct copy of that cover email.

20 6. Attached hereto as **Exhibit E** is a true and correct copy of Trial
 21 Exhibit 2212.

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3 I declare under penalty of perjury of the laws of the United States of
4 America that the foregoing is true and correct.

5 Executed at Santa Ana, California on this 5th day of August, 2016.

/s/ Nima H. Mohebbi

Nima H. Mohebbi